

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ZENIA BROWNE	:	
	:	
Plaintiff	:	
v.	:	Civil Action No. 5:23-cv-04278-JMG
	:	
LUTHERAN MANOR OF THE LEHIGH VALLEY, INC.	:	JURY TRIAL DEMANDED
	:	
Defendant	:	

**DEFENDANT’S MOTION TO DISMISS  
PLAINTIFF’S COMPLAINT PURSUANT TO RULE 12(b)(6)**

AND NOW, comes Defendant, Lutheran Manor of the Lehigh Valley, Inc. (“Lutheran Manor”), by and through its counsel, Ward Law, LLC, and moves to dismiss Plaintiff, Zenia Browne’s, Complaint pursuant to Fed. R. Civ. P. 12(b)(6). For the reasons set forth in Lutheran Manor’s accompanying Brief, Defendant requests that this Court grant this Motion and enter an Order consistent with the proposed Order of the Defendant.

Respectfully submitted,

**WARD LAW, LLC**

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